

EXHIBIT A

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Exemplary Chart for U.S. Patent No. 11,744,256¹ for Defendant No. 4 Bstars US, Seller ID A3G6T9J13ABHB7

The primary elements of claim 1 (copied fully below in the left column of the chart) are:

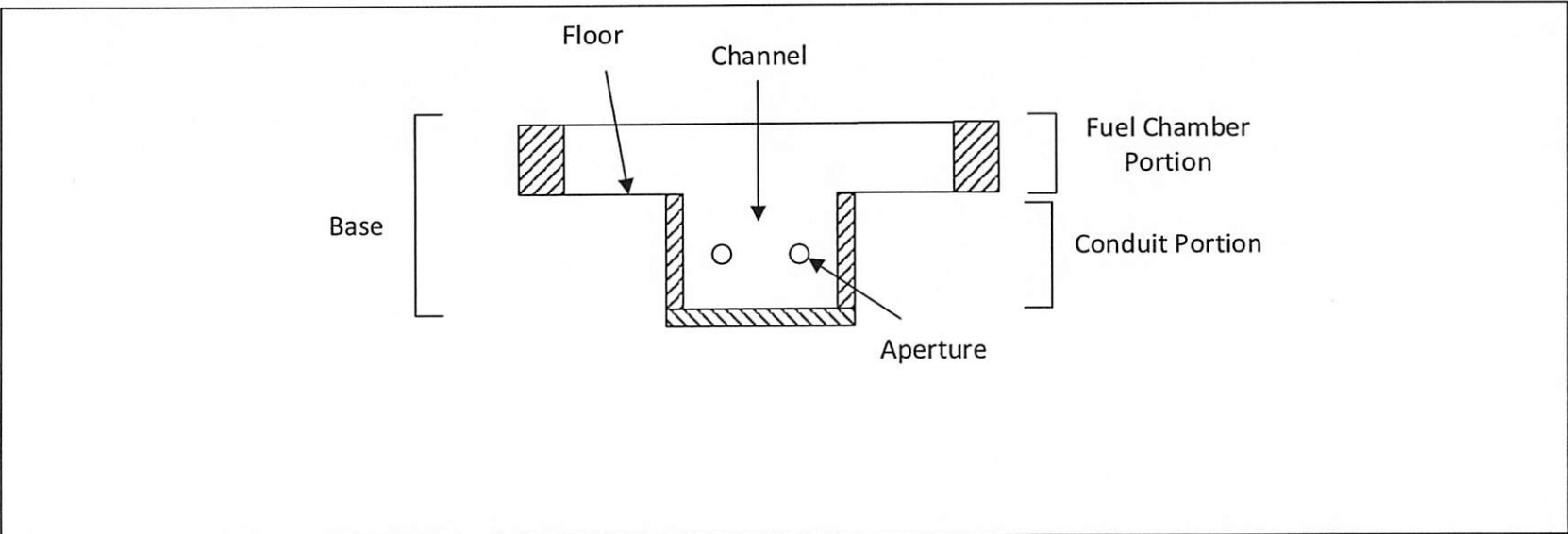
- Fuel Chamber Portion
- Conduit Portion
- Floor
- Channel
- Aperture extends from channel through a wall of Conduit Portion

There are no limitations in the claims for the size, shape, or orientation of the fuel chamber portion, conduit portion, wall in conduit portion, or aperture through a wall of the conduit portion, except that the conduit portion is disposed below the floor.

The following diagram is an exemplary mock-up in cross-section of the type of defendant's smoker product design, with identification of the claim elements. Claims elements are also shown in the chart below using images of Defendant's product.

¹ Plaintiff provides this exemplary claim chart for the purposes of showing one basis of infringement of one of the claims of the 11,744,256 patent by Defendant's accused products as defined in the complaint. This exemplary claim chart addresses the Accused Products broadly based on the fact that the Accused Products infringe in the same general way. Plaintiff reserves the right to amend and fully provide its infringement arguments and evidence thereof until its Preliminary and Final Infringement Contentions are later produced according to the court's scheduling order in this case.

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Claim 1

A device for imparting smoked flavors to beverages and foodstuffs, comprising:

The Amazon.com sellers page lists a product for sale under ASIN B0CJNXMHC2 is a “Cocktail Smoker Kit. . . with 6 Flavors Wood Chips. . .” which is a device for imparting smoked flavors to beverages and foodstuffs.

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Roll over image to zoom in


7 videos

Cocktail Smoker Kit with Torch, 6 Flavors Wood Chips for Whiskey and Bourbon, Old Fashioned Smoker Kit for Infused Cocktail, Cheese, Salad and Meats, Gifts for Men, Dad and Boyfriend (No Butane)

Brand: Nusican

4.5

117 ratings

Amazon's Choice  in Outdoor Smokers by Nusican


500+ bought in past month

-40% \$29.98

List Price: \$49.98

One-Day

FREE Returns

Coupon:  Apply 15% coupon Shop items | Terms

Redeem Save 8% on 4 select item(s) promo code: LXRE4CNS Terms

With Amazon Business, you would have saved \$281.77 in the last year. Create a free account and save up to 13% today.

Extra Savings Save 6% on 3 select item(s) promo co... 2 Applicable Promotion(s)

Size: 1 Pack

1 Pack
\$29.98

1 Wood Chips
\$19.98

2 Pack
\$59.98

\$29.98

One-Day

FREE Returns

FREE delivery Tomorrow, June 5. Order within 6 hrs 26 mins

Deliver to KENDAL - Alexandria 22304


In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by Bstars US
Returns Eligible for Return, Refund or Replacement...
Payment Secure transaction

 See more

☐ Add a gift receipt for easy returns

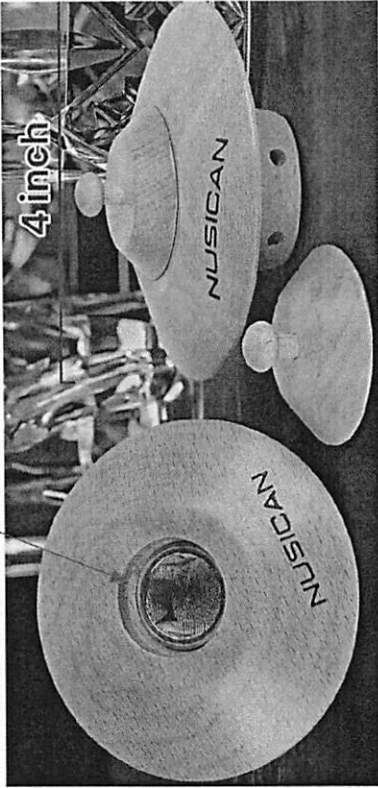
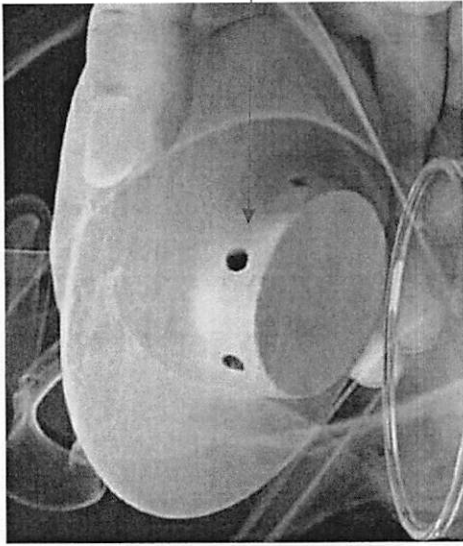
Add to List

Other sellers on Amazon

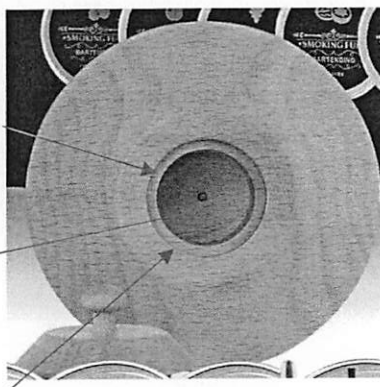
a base
having a
fuel

The "Cocktail Smoker" is a "base" unit that has a fuel chamber at the upper end that can hold wood chips:

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<p>chamber portion at its upper end and</p>	<div data-bbox="280 1178 339 1493" data-label="Text"> <p>fuel chamber portion</p> </div> 
<p>a conduit portion at its lower end,</p>	<p>The Cocktail Smoker has an element protruding at the bottom of the base that is a conduit portion.</p> 

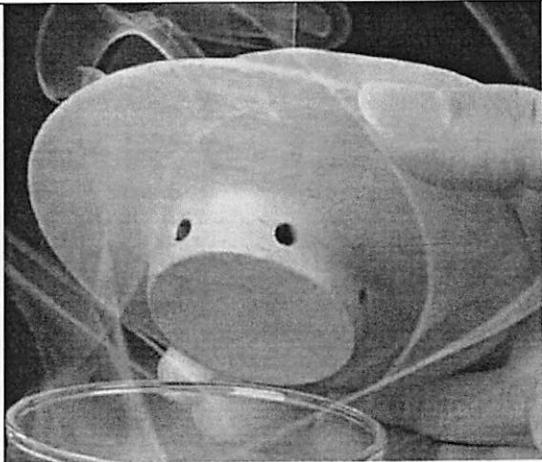

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<p>the fuel chamber portion comprising an upper wall portion defining a perimeter edge of the fuel chamber portion and a floor defining a bottom end, the floor extending from the upper wall portion to an opening in the floor</p>	<p>The fuel chamber for the Cocktail Smoker has a wall. The wall defines a perimeter of the fuel chamber portion. The fuel chamber for the Drink Smoker has a floor of the fuel chamber portion that extends from the wall to an opening in the floor.</p> <div data-bbox="659 417 1312 852">  </div>
<p>wherein the fuel chamber portion is oriented to hold fuel, and</p>	<p>The fuel chamber of the Cocktail Smoker is oriented to hold wood chips for burning. In the instructions on the storefront page, the seller shows the consumer how to place the device on a glass and add wood chips in the fuel chamber for burning with a torch.</p>

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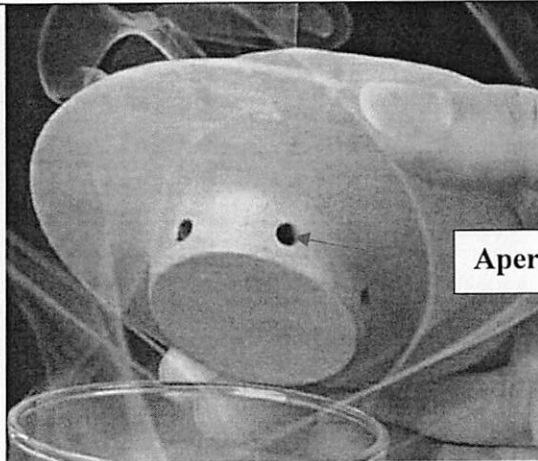
	<div data-bbox="401 212 1182 690"></div> <div data-bbox="401 690 1182 781"><p>Prepare the drink and add wood chips</p></div>
<div data-bbox="226 792 378 1000"><p>wherein the conduit portion is disposed below the floor</p></div>	<div data-bbox="401 792 1864 824"><p>The conduit portion of the Cocktail Smoker is oriented below the floor of the fuel chamber.</p></div> <div data-bbox="401 927 785 1304"></div>

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	 <p>Conduit portion below floor of fuel chamber</p>
and comprises a channel through the conduit portion	<p>The channel through the conduit of the Cocktail Smoker is shown on the seller's webstore.</p>  <p>Channel</p>
so that, when the fuel in the fuel	<p>The conduit portion of the Cocktail Smoker has at least one hole, or aperture, in its wall that leads to the channel:</p>

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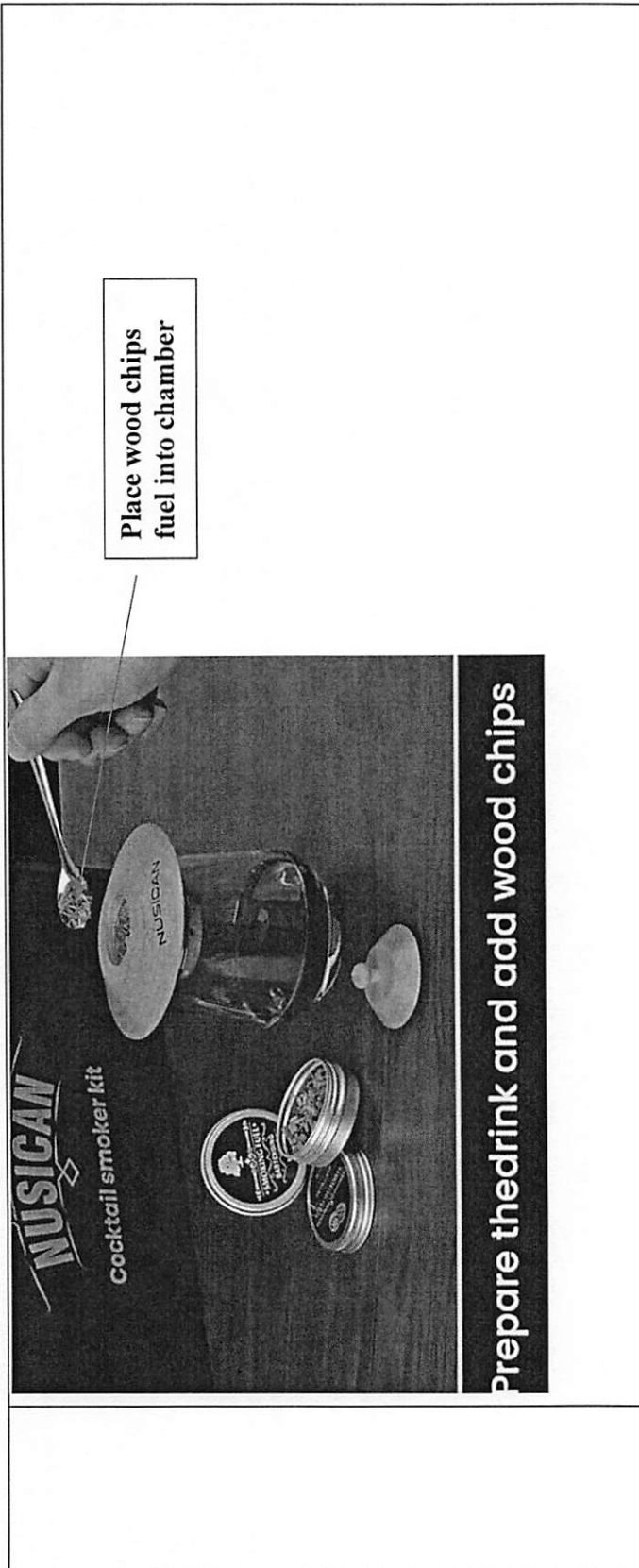
chamber portion is ignited, the channel facilitates flow of smoke downward from the fuel chamber portion through at least one aperture that extends from the channel space through a wall of the conduit portion



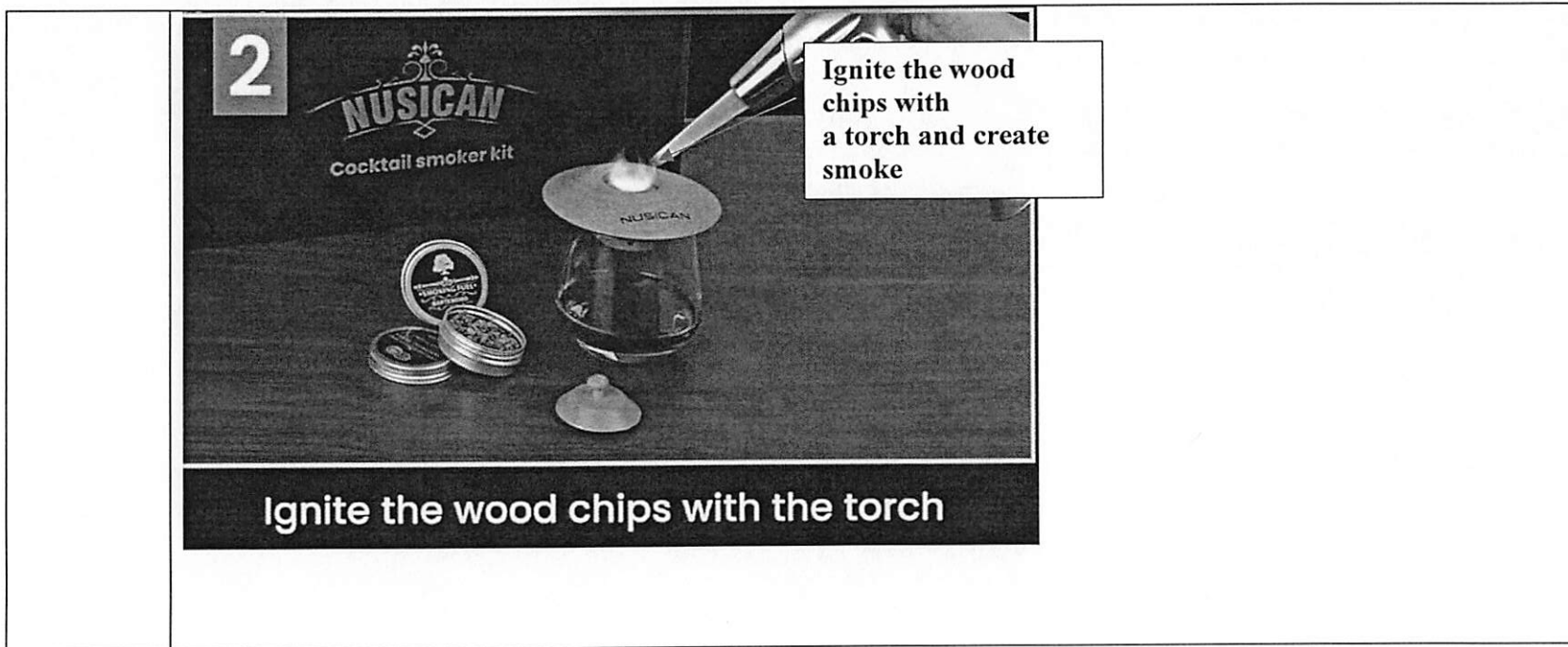
Aperture

The instructions demonstrate that when the fuel in the fuel chamber is ignited by a blow torch, the smoke from the ignited fuel flows down from the fuel chamber, through the channel, and out at least one aperture in the conduit into the drinking glass.

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